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14 *Attorneys for Defendants*
 15 UBER TECHNOLOGIES, INC.,
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17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA**

19 **SAN FRANCISCO DIVISION**

20 IN RE: UBER TECHNOLOGIES, INC.,
 21 PASSENGER SEXUAL ASSAULT
 LITIGATION

23 This Document Relates to:

24 *Jaylynn Dean v. Uber Technologies, Inc.*
 et al., Case No. 3:23-cv-06708-CRB

25 Case No. 3:23-md-03084-CRB (LJC)

26 **DEFENDANTS UBER TECHNOLOGIES,
 INC., RASIER, LCC, AND RASIER-CA, LLC
 TRIAL WITNESS LIST**

1 Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (“Defendants”) submit
2 the following list of witnesses to testify at the trial of this matter:

3 **Defendants will likely call the following expert witnesses at trial:**

4 **1. Sarah Kauffman, M.D.**

5 Defendants expect Dr. Kauffman to testify consistent with her report and deposition concerning
6 Dr. Mechanic’s evaluation of Plaintiff.

7 **2. Joseph Okpaku, J.D.**

8 Defendants expect Mr. Okpaku to testify consistent with his report and deposition concerning
9 Uber’s control over the conduct of third-party drivers; industry standards regarding safety in for-hire
10 transportation; regulatory frameworks applicable to the rideshare industry, regulatory initiatives in
11 response to the same; Uber’s safety policies and practices; and the comparative safety of rideshares
12 versus other forms of transportation.

13 **3. Eric L. Piza, Ph.D.**

14 Defendants expect Dr. Piza to testify consistent with his report and deposition concerning the
15 deterrent effect of video surveillance technologies on criminal conduct, if any; including the likely
16 deterrent impact, if any, of dashcams in rideshares like Uber.

17 **4. Victoria Stodden, Ph.D.**

18 Defendants expect Dr. Stodden to testify consistent with her report and deposition concerning
19 Uber Safety Reports, statistical rate of sexual assault and/or misconduct that occurs during Uber rides;
20 and comparative rates of sexual assault/misconduct in alternative transportation services and within the
21 United States.

22 **5. Kristen M. Zgoba, Ph.D.**

23 Defendants expect Dr. Zgoba to testify consistent with her report and deposition concerning rates

1 of sexual assault and sexual misconduct and factors impacting those rates; Uber's Taxonomy; Uber's
2 background checks; and limitations to predicting first time sexual offenders.

3 **Defendants will likely call the following fact witnesses at trial:**

4 **6. Emilie Boman (live)**

5 Defendants expect Ms. Boman to testify concerning Uber's efforts to reduce sexual
6 assault/sexual misconduct on the platform and its work with internal and external stakeholders regarding
7 women's safety.

8 **7. Greg Brown (by deposition)**

9 Mr. Brown will testify about Hassan Turay's education and training and Uber's investigation
10 into prior complaints related to Mr. Turay.

11 **8. Chad Dobbs (live)**

12 Defendants expect Mr. Dobbs to testify concerning Uber's lack of control over third-party
13 independent drivers and Uber's independent contractor model.

14 **9. Todd Gaddis (live)**

15 Defendants expect Mr. Gaddis to testify consistent with his declaration concerning the absence
16 of in-app audio recording on the subject trip.

17 **10. Sachin Kansal (live)**

18 Defendants expect Mr. Kansal to testify concerning Uber's commitment to safety during his
19 tenure at the company, including Uber's release of multiple safety features over time.

20 **11. Detective Oscar Lopez, Tempe Police Department (live)**

21 Detective Lopez was the lead investigator in Plaintiff's case and is expected to testify concerning
22 his investigation into the alleged assault and various Tempe PD records.

1 **12. SM (by deposition)**

2 SM will testify about his interactions with and observations of Plaintiff immediately prior to the
3 subject ride and communications with Plaintiff following the encounter.

4 **13. Hassan Turay (by deposition)**

5 Mr. Turay, the driver, will testify concerning the subject ride and communications with law
6 enforcement following the encounter with Plaintiff.

7 **14. Jessica Weaver (by deposition)**

8 Ms. Weaver is the nurse who administered Plaintiff's SANE exam and will testify concerning
9 that exam.

10 **Defendants may call the following expert witnesses to trial:**

11 **1. Jason Morris**

12 Defendants expect Mr. Morris to testify consistent with his reports and deposition concerning
13 Uber's background check and process.

14 **2. Christopher Wilson**

15 Defendants expect Mr. Wilson to testify consistent with his report and deposition concerning
16 technical challenges to universal, mandatory implementation of a dashcam program or in-app video
17 recording.

18 **Defendants may call the following fact witnesses at trial:**

20 **3. Michael Akamine (by deposition)**

21 Mr. Akamine will testify concerning Uber's efforts to reduce safety incidents on the Uber
22 platform.

23 **4. Frank Chang (by deposition)**

24 Mr. Chang will testify about Uber's efforts to issue its Safety Reports and Uber's investment in

safety.

5. Heather Childs (live or by deposition)

Defendants expect Ms. Childs to testify concerning Uber's Law Enforcement/Public Safety Response Team and other safety-related efforts.

6. Elisa Gregg (by deposition)

Ms. Gregg will testify about her knowledge of Plaintiff's background, mental health, and the events surrounding the alleged assault by Mr. Turay.

7. Roger Kaiser (by deposition)

Mr. Kaiser will testify about Uber's commitment to safety and work with law enforcement.

8. Katy McDonald (by deposition)

Ms. McDonald will testify consistent with her trial preservation deposition on January 7, 2026.

9. Hannah Nilles (by deposition)

Ms. Nilles will testify concerning Mr. Turay's background check and onboarding process.

10. Sunny Wong (by deposition)

Mr. Wong will testify consistent with his trial preservation deposition on January 7, 2026.

11. Corporate representative of custodian of records for the Tempe Police Department (live)

If the parties cannot reach agreement about the admissibility of records received by subpoena from the Tempe Police Department, Defendants expect this witness to authenticate Tempe Police Department documents, dash cam videos, and audio recordings related to the investigation of Plaintiff's sexual assault report if the parties cannot reach a stipulation about the admissibility of these records and recordings.

In addition to the above witnesses, Defendants reserve the right to call at trial any of the

1 following:

2 Any witness, including expert witnesses, named by Plaintiff. Defendants specifically reserve
3 their right to designate affirmative deposition testimony of Defendants' company
4 witnesses called by Plaintiff;
5 Any custodian of records or other witness needed to authenticate documents; and
6 Any additional expert or non-expert witness not listed herein for the purposes of
7 impeachment or rebuttal.

8 Defendants reserve the right to amend and/or supplement this list.

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11 Dated: December 30, 2025

KIRKLAND & ELLIS LLP

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CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2025, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system which will automatically send Notification of the filing to all counsel of record.

/s/ Laura Vartain Horn
Laura Vartain Horn